

**Officer delegated decision – 26<sup>th</sup> June 2019**

**Report title:** Proposed Controlled Parking Zone Consultations - Streatham Area

**Wards:** St Leonard's, Streatham South, Streatham Wells, Streatham Hill

**Report Authorised by:** Bayo Dosunmu, Strategic Director of Resident Services

**Portfolio:** Councillor Claire Holland: Cabinet Member for Environment & Clean Air

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**Report summary**

A 2018 resident's attitudinal survey on parking sought residents' views on parking controls in the wards of St Leonard's, Streatham South and Streatham Wells. Responses to this survey support public consultation on detailed proposals for controlled parking to be undertaken in two phases across two of the three wards surveyed:

- Phase 1: St Leonard's and part of Streatham South in the vicinity of Streatham Common Station
- Phase 2: the remainder of Streatham South

In Streatham Wells ward, ward councillors have advised they do not perceive a ward wide parking issue that sufficiently concerns them to endorse undertaking a public consultation at this point in time, but will be ensuring careful monitoring of the situation. The results of the resident's attitudinal survey also confirm this view.

**Finance summary**

The Stage 1 consultation costs for the introduction of Controlled Parking Zones, estimated at £120,000 in Phase 1 for St Leonards and Streatham Vale West area and at £100,000 in Phase 2 for Streatham South ward (remaining uncontrolled roads of area), will be met from a combination of S106 receipts and funding allocated from the Parking Places Reserve Account (PPRA).

As currently scoped, were the council to decide to implement both phases of controlled parking, provision has been made in the capital budget to meet the estimated £600,000 cost.

**Recommendations**

- (1) To grant scheme approval to the proposed controlled parking zones (CPZs) illustrated in Appendix B to this report.
- (2) To undertake a Stage 1 Consultation in 2019/20 on proposals to introduce Controlled Parking Zone/s in St Leonard's and Streatham Vale West shown as Phase 1 in Appendix B).

- (3) To undertake a Stage 1 Consultation in 2020/21 on proposals to introduce Controlled Parking Zone/s in the remaining uncontrolled roads of Streatham South ward (shown as Phase 2 in Appendix B).
- (4) To undertake a Stage 1 Consultation in 2019/20 on proposals to introduce Controlled Parking Zone/s in Hailsham Avenue, Keymer Road and Lydhurst Avenue.
- (5) That the outcome of each of the above consultations be reported to the Cabinet Member for the Environment and Clean Air prior to any decision being made on whether to proceed to statutory consultation.

## **1. Context**

1.1 Road transport is the third biggest source of carbon emissions in Lambeth. The Council has declared a Climate Emergency and committed to being carbon neutral by 2030. CPZ's helps us to achieve this commitment. It:

- Improves the quality of life for residents by reliably being able to park close to their home.
- Discourages car-borne commuting, thereby encouraging the use of more sustainable modes of transport and improving air quality.
- Frees-up kerbside space for use by delivery vehicles, electric vehicle charging points, cycle hangars, short-stay visitors and customers.
- Makes the borough's streets safer, less congested and protects access for the vehicles who need to use them.
- Prioritises the needs of pedestrians, cyclists and bus users.
- Encourages owners to switch to low-emission vehicles when changing vehicles.
- Can improve the visual amenity of the borough's streets, particularly in town centres and residential areas.

1.2 In 2016 the Council undertook a borough-wide parking feasibility study to review the Council's existing controlled parking zones (CPZ's) and assess the need for new parking controls in the non-CPZ areas. As part of this, the Council commissioned SYSTRA (formally JMP) to carry out parking stress surveys in streets that lay outside a CPZ in the areas of Streatham Hill, St Leonard's, Streatham South and West Norwood. These surveys revealed that in the south of the borough, many streets were under acute parking stress. A phased (domino effect) consultation approach was recommended, consulting one area after another.

1.3 Officers met with councillors from the Streatham wards on 2 Nov 2017 to discuss their concerns over the prioritisation and likely timescales for consulting residents on parking controls in their wards. Whilst agreeing that Streatham Hill would form the next phase of CPZ expansion in 2018/19, councillors were concerned that the phased delivery approach

would result in a significant number of their constituents seeing no progress being made in addressing their parking issues until after 2020.

- 1.4 Responding to this concern, the Cabinet Member agreed to undertake a parking attitudinal survey with all residents of the other Streatham wards (St Leonard's, Streatham South and Streatham Wells). This was carried out between 12 February and 12 March 2018.
- 1.5 A total of 20,095 properties were sent survey documents containing a newsletter explaining the reasons for the survey and how to participate. A frequently asked questions (FAQ's) document was provided to answer common CPZ-related questions as was Lambeth's permit pricing structure. Copies of the documents provided are attached as Appendix G.
- 1.6 A webpage was also created which contained all the relevant information. On this webpage was a link to a survey where residents/businesses could complete and submit their views including a section for comments. This was the primary method of participation in the survey provided through the newsletter
- 1.7 Anyone who was either unable to access the website or complete the online survey was invited to telephone, requesting that a hardcopy questionnaire be sent to their home. The details of this telephone request line was in the newsletter sent out to all properties.
- 1.8 The council received 3,032 responses, representing a response rate of 15.0%. A visual representation of the overall survey results are shown in Appendix A.

## **2. Proposal and Reasons**

### St Leonard's Ward

- 2.1 Of the 7,168 properties consulted in St Leonard's ward, we received a total of 1,122 responses, representing a response rate of 15.7%.
- 2.2 The detailed attitudinal survey's results (see Appendix C) indicates 525 (46.8%) of all respondents felt that they had a parking problem in their road, as opposed to 522 (46.5%) who felt that they do not. A further 74 (6.6%) were undecided and 1 (0.1%) did not answer this or any of the subsequent questions.
- 2.3 Of the 1,122 who responded, 726 (64.7%) were interested in their road being consulted for a CPZ compared to 349 (31.1%) who did not and 46 (4.1%) who were undecided.
- 2.4 Taking account of the possible displacement effect, residents were asked if they would want their road consulted if their neighbouring road/s were being consulted for a CPZ. Of the 1,122 who responded, 866 (77.2%) were interested compared to 186 (16.6%) who still did not want their road consulted; 59 (5.3%) were undecided and 11 did not answer the question.
- 2.5 Given that this survey data indicates a majority of respondents in St Leonard's ward being interested in parking controls, it is recommended that public consultation be carried out on an indicative CPZ in this ward first. This approach also aligns to the principles of the CPZ

expansion programme which considers that the most effective way to introduce controlled parking is to do so incrementally along an advancing front, primarily to enable relatively rapid relief for those streets suffering the worst parking stress and also to allow residents in streets less affected by parking stress to adjust to the effects of any parking displacement before deciding whether they wish to support controlled parking.

#### Streatham South Ward

- 2.6 Of the 5,633 properties consulted in Streatham South we received a total of 1,012 responses, representing a response rate of 18.0%.
- 2.7 Appendix D, 658 (65.0%) of these respondents said that they did not have a parking problem in their road, as opposed to 299 (29.5%) who felt that they did. A further 54 (5.3%) were undecided and 1 did not answer the question.
- 2.8 Of the 1,012 who responded, 51.9% were interested in their road being consulted on a new CPZ compared with 41.9% who did not; 63 (6.2%) were undecided.
- 2.9 Taking account of the possible displacement effect, residents were asked if they would want their road consulted if their neighbouring road/s were consulted on a new CPZ, 675 (66.7%) said they would be interested compared to 241 (23.8%) who still did not want their road consulted; 81 (8%) were undecided and 15 (1.5%) did not answer this question.
- 2.10 Whilst this survey data indicates that the majority of the respondents in Streatham South ward are not supportive of parking controls, Streatham South's ward councillors have asked that their ward be assessed in two parts. Specifically, they have asked that an area in the vicinity of the Streatham Common Station (referred to as Streatham Vale West and illustrated in Appendix B), already under acute parking pressure is included in the Phase 1 (St Leonard's) scheme. This is to pre-empt the additional parking pressure that would result from the likely displacement were a CPZ to become operational in the nearby streets of St Leonard's ward.

#### Streatham Wells Ward

- 2.11 Of the 7,050 properties consulted in Streatham Wells, we received a total of 859 responses, representing a response rate of 12.2%.
- 2.12 The attitudinal survey's detailed results shown in Appendix E indicates 567 (66%) of all respondents felt that they did not have a parking problem in their road, as opposed to 239 (27.8%) who felt that they did; 52 (6.1%) were undecided and 1 did not answer.
- 2.13 Of the 859 who responded, 472 (55.0%) were interested in their road being consulted for a CPZ compared to 344 (40.0%) who did not; 43 (5.4%) were undecided.
- 2.14 Taking account of the possible displacement effect residents were asked if they would want their road consulted if their neighbouring road/s were being consulted for a CPZ. Of the 859 who responded, 642 (74.7%) were interested compared to 46 (19.3%) who still

did not want their road consulted; 46 (5.4%) were undecided and 5 did not answer the question.

- 2.15 Whilst the survey has demonstrated some appetite for exploring parking controls in Streatham Wells, there is insufficient evidence to support progressing a CPZ. Ward councillors have advised they do not currently perceive there to be a ward-wide parking issue sufficient to endorse a public consultation at this point in time, but will be ensuring careful monitoring of the situation.

#### Streatham Hill Ward (Hailsham Avenue triangle area)

- 2.16 Generally, CPZ boundaries do not follow ward boundaries and instead are typically chosen to reflect physical cues. In the case of the proposed Streatham Hill East CPZ (which was recently consulted upon) the railway line was chosen as the southern boundary. This resulted in the exclusion from that scheme's consultation of the roads in Streatham Hill ward's "Hailsham Avenue triangle". This section of Streatham Hill was to be consulted along with the adjacent Streatham Wells area. However, in light of Streatham Wells proposed exclusion from further consultation at this stage, ward councillors from Streatham Hill would prefer to have the few remaining roads of their ward consulted now to avoid consultation in this area being delayed until such time when Streatham Wells request controls.
- 2.17 An attitudinal survey was carried out in the Hailsham Avenue triangle to establish residents' views in respect of on-street parking. The outcome of this is summarised in the following paragraphs with detailed consultation results shown in Appendix F.
- 2.18 Of the 244 properties consulted, we received a total of 24 responses, representing a response rate of 9.8%. Of these, 21 (87.5%) felt that they do not have a parking problem in their road, as opposed to one (4.2%) who felt that they did. Two were undecided.
- 2.19 Of the 24 who responded, interest in their road being consulted for a CPZ was split 50:50.
- 2.20 Taking account of the possible displacement effect, residents were asked if they would want their road consulted were their neighbouring road/s offered a CPZ: 14 respondents (58.3%) said that they would be interested compared to 5 (20.8%) who said they would not. The remaining 5 did not answer this question.
- 2.21 Whilst the attitudinal survey shows relatively weak interest in being consulted on a CPZ, ward councillors support including the Hailsham Avenue triangle in the proposed Streatham Hill East CPZ; subject to a of stage 1 consultation to bring it in line with the rest of the Streatham Hill east area.

#### Proposed CPZ: Phase 1 Consultation Area

- 2.22 In light of the evidence provided by the attitudinal survey, and in consultation with ward councillors, it is recommended that the proposed phase 1 consultation area should comprise the entire St Leonard's ward and the section of Streatham South ward termed "Streatham Vale West" (see Appendix B).

### Format of Stage 1 Consultation

- 2.23 In officers' experience, when considering the introduction of a new CPZ a council should first undertake the Stage 1 Consultation on the detailed proposals before deciding whether to undertake the statutory consultation on the traffic orders required to introduce a CPZ.
- 2.24 The primary format for inviting responses to this type of public consultation is a newsletter explaining what the proposed changes are, the reasons for the consultation, an explanation of how a CPZ works, the current permit pricing structure and instructions on how to go online to participate in the consultation. A frequently asked questions (FAQ's) document is also provided to answer common CPZ-related questions.
- 2.25 A webpage will be created on the council's website containing all the relevant information and detailed plans of the council's proposals. The webpage will have a link to an online survey where consultees can complete and submit their views including comments.
- 2.26 For anyone unable to either access the website or complete the online survey, a telephone request line will be created where respondents could request maps and questionnaire to be sent to their home address. The details of this telephone request line will be provided in the newsletter sent out to all properties.
- 2.27 An exhibition will be held on a Saturday during the consultation at a local venue from 10am to 4pm allowing residents and businesses to discuss the proposed measures with officers.

### Proposed Parking Controls

- 2.28 Consultees who support the introduction of a CPZ will be asked what hours of the day and days of the week they would like it to operate. Information on eligibility for the types of permit (resident, business, visitor, etc.) will be provided in the consultation newsletter and on the relevant pages of the council's website. To keep down operating costs, reduce the risk of fraud and to provide customers with a better speed of service, all parking permits would be virtual rather than physical. This would require the vehicle owner to go online to register their vehicle details and to make payment.
- 2.29 To keep down operating costs, any new CPZ will be cashless and will not include any pay-and-display ticket machines. The consultation will propose that drivers without a permit who wish to park will need to pay (currently £3.00 per hour) using the council's Pay by Phone (PbP) service. This involves drivers using their mobile phone, to pay (using a credit or debit card) either by (a) accessing a mobile application ("app"), (b) going online using the web, (c) telephoning, or (d) texting. Drivers who either do not have a mobile phone with them or would prefer to pay with cash would be able to pay to park at one of the Pay Points located in shops throughout the borough.

## **3. Finance**

### Expenditure

- 3.1 The forecast financial implications of this report's recommendations are:

<b>Description</b>	<b>2019/20</b> (Phase 1) (£)	<b>2020/21</b> (Phase 2) (£)
Staff time (design and analysis)	40,000	40,000
Stage 1 consultation (material & postage)	20,000	15,000
Statutory consultation (inc staff time considering objections)	20,000	15,000
Legal costs (writing & advertising traffic orders, etc)	20,000	15,000
Implementation Newsletter	20,000	15,000
<b>Total</b>	<b>120,000</b>	<b>100,000</b>

- 3.2 Whilst any decision to proceed beyond public consultation will be subject to a separate decision report, were the proposals to proceed to implementation, the consequential financial implications (all capital) are forecast to be:

<b>Description</b>	<b>2020/21</b> (Phase 1) (£)	<b>2020/21</b> (Phase 2) (£)
Implementation cost	300,000	300,000
<b>Total</b>	<b>300,000</b>	<b>300,000</b>

#### Budget

- 3.3 The costs detailed in paragraph 3.1 for Phase 1 2019/20 will be met a combination of S106 receipts and funding allocated from the Parking Places Reserve Account (PPRA) as set out below

<b>Funding Stream</b>	<b>Amount (£)</b>
S106	18,000
Parking Places Reserve Account	102,000
<b>Total</b>	<b>120,000</b>

- 3.4 The costs detailed in 3.1 for Phase 2 2020/21 will be met from the Parking Places Reserve Account.
- 3.5 Subject to a separate decision report, the consequential capital costs detailed in paragraph 3.2 if either, or both phases proceed to implementation would be sought from the Parking Places Reserve Account (PPRA) provision for which has been made, and from relevant S106 receipts.

#### Income and Savings

- 3.6 If implemented as currently scoped, Phase 1 and Phase 2 of the proposed CPZ are each forecast to result in a £150,000 annual income arising from permit sales. Whilst there would also be income arising from penalty charge notices, this is estimated to equal the cost of operating and enforcing the new CPZ.

## **4. Legal and Democracy**

- 4.1 The public consultation recommended by this report is not of the statutory type that is required under the Road Traffic Regulation Act 1984 to be undertaken prior to a council making the traffic orders for a CPZ. That statutory consultation will be required in due course if the outcome of the public consultation justifies the proposal.
- 4.2 By virtue of section 122 of the 1984 Act, the Council must exercise its powers under that Act so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. These powers must be exercised so far as practicable having regard to the following matters:-
- the desirability of securing and maintaining reasonable access to premises.
  - the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
  - the national air quality strategy.
  - the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
  - any other matters appearing to the Council to be relevant.

A recent High Court judgment confirms that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

- 4.3 The history and outcome of non-statutory stakeholder consultation undertaken to date is detailed in sections 2 and 5 of this report. The following principles of consultation were set out in a recent High Court case: First, a consultation had to be at a time when proposals were still at a formative stage. Second, the proposer had to give accurate and sufficient reasons for any proposal to permit of intelligent consideration and meaningful response. Third, adequate time had to be given for consideration and response, and finally, the product of consultation had to be considered with a receptive mind and conscientiously taken into account in finalising any statutory proposals. The process of consultation had to be effective and looked at as a whole it had to be fair. Fairness might require consultation not only upon the preferred option, but also upon discarded options.
- 4.4 The Council's Constitution requires that all key decisions, decisions which involve resources between the sums of £100,000 and £500,000, and important or sensitive issues, must be published on the website for five clear days before the decision is approved by the Director or Cabinet Member concerned. Any representations received during this period must be considered by the decision-maker before the decision is taken.

## **5. Consultation and co-production**

- 5.1 Section 2 of this report and supporting Appendices C to G describe the details of the attitudinal survey engagement process carried out to inform the recommendations of this report.
- 5.2 Officers have worked closely with ward councillors for St Leonard's, Streatham South, Streatham Wells and Streatham Hill in developing the CPZ expansion programme.



- 5.3 Whilst the 2018 survey demonstrated some appetite for exploring parking controls in Streatham Wells, ward councillors have advised that they do not currently perceive a ward-wide parking issue sufficient to endorse a consultation at this point in time, but will be ensuring careful monitoring of the situation.
- 5.4 Stage 1 CPZ consultation for Phase 1 will be carried out as described in paragraphs 2.25 – 2.29 in May/June 2019 subject to approval of the recommendations of this report.
- 5.5 All representations regarding the stage 1 consultation along with Officers' comments and recommendations will be presented in a report for consideration by the Cabinet Member for Environment & Clean Air.
- 5.6 Stage 1 consultation for Phase 2 is envisaged to be carried out in April/May 2020.
- 5.7 Within this area there are some Lambeth owned housing estates as shown in Appendix B. Taking account the possible displacement nature of introducing new CPZs on the public highway, a holistic approach will be taken to ensure Lambeth and private housing estates are fully considered as part of the stage 1 consultation process and all subsequent stages as are agreed.

## **6. Risk management**

- 6.1 The risk of not consulting on the proposed CPZ is that the benefits described in paragraph 1.1 and 3.5 of this report will be not achieved.
- 6.2 Because of the significant resources required to introduce a CPZ, the risks of such a proposal proving abortive needs to be minimised. Officers and Members consider that the 2018 attitudinal survey provides a robust indicator of where support for parking controls is likely to be sufficient to justify a new CPZ. However, parking controls are controversial and notwithstanding the response rate to the 2018 attitudinal survey being relatively high for a survey of this type, 85% of residents have not shared their opinions on the proposal. Accordingly, there is a risk that the public consultation will not generate sufficient support to install a CPZ thereby making the £110,000 expenditure on public consultation abortive.
- 6.3 As described in section 4, carrying out the recommended public consultation does not in itself provide the council with authority to introduce a CPZ. Were the responses sufficient to justify proceeding with the proposal, a further round of statutory public consultation would be required. Undertaking an initial public consultation on an indicative CPZ as recommended in this report minimises abortive costs and risks associated with decisions being 'called-in' or objectors taking any decisions made by the council through the judicial review process.

## **7. Equalities impact assessment**

7.1 None as a result of this report. The public consultation recommended in this report is an important component of how the council will fulfil its duty under Section 149 of the Equality Act 2010.

## 8. Community safety

8.1 All road space in a CPZ is managed by the introduction of parking controls. Parking is only permitted where safety, access and sight lines are not compromised. It is, therefore, normal practice to introduce double yellow lines at key locations such as at junctions, bends, turning heads and at specific locations along lengths of roads where parking would impede the passing of vehicles. It is also necessary to provide yellow line waiting restrictions (effective during the CPZ hours of operation or at any time) where the kerb is lowered, i.e. at crossovers for driveways.

8.2 Introducing CPZs also results in uniformed enforcement officers walking the streets in the area, thereby increasing natural surveillance.

## 9. Organisational implications

### 9.1 Staffing and accommodation

Provision will need to be made to resource the staffing requirement within the Highways, Capital Programmes and Sustainability service.

### 9.2 Environmental

The proposals support our 2017-2022 Air Quality Action Plan; Action 43 to review parking in the borough; and Action 46 reprioritisation of road space.

Road transport is the main source of air pollution in Lambeth; these proposals will help to improve air quality as they will encourage modal shift to more sustainable transport. Furthermore, the Mayor is proposing to extend the Ultra-Low Emission Zone (ULEZ) to the South Circular. These proposals will deter drivers from driving to and leaving their highly polluting vehicles at the ULEZ border.

### 9.3 Procurement

None as a result of this report.

## 10. Timetable for implementation

10.1 The following table sets out the anticipated timescales and stages of the new CPZ in Phase 1 - St Leonard's and Streatham Vale West area.

Phase 1	Target timescale
DMT: Stage 1 consultation ODDR	June 2019
Stage 1 Consultation (as per this report's recommendations)	July/August 2019
DMT: Statutory consultation ODDR (subject to Stage 1 results)	November 2019
Delivery of Statutory Consultation	January 2020
DMT: Objections/scheme approval ODDR (if applicable)	April 2020
Implementation phase(s)	May-July 2020
Zone Operational	September 2020

10.2 The following table sets out the anticipated timescales and stages of the new CPZ in Phase 2 - Remainder of Streatham South; the detailed programme will be designed as part of the project's mobilisation from January 2020.


<b>Phase 2</b>	<b>Target Timescale</b>
Stage 1 Consultation (as per this report's recommendations)	Apr-May 2020
Statutory Consultation	Sep-Oct 2020
Implementation	Feb 2021
Zone Operational	Apr 2021

<b>Audit trail</b>				
<b>Consultation</b>				
<b>Name/Position</b>	<b>Lambeth cluster/ division or partner</b>	<b>Date Sent</b>	<b>Date Received</b>	<b>Comments in para:</b>
Raj Mistry, Director Environment and Streetscene	Environment and Streetscene, Resident Services	11.06.19	20.06.19	Report agreed at Environment Management team
Andrew Burton, Assistant Director, Highways, Capital Programmes and Sustainability	Environment and Streetcare, Resident Services	08.04.19	18.04.19	Throughout
Jean-Marc Moocarme Legal Services	Legal and Governance	07.06.19	11.06.19	
Sam Bailey, Democratic Services	Legal and Governance	07.06.19	12.06.19	
Derek Roopnarine, Finance Group Manager	Finance and Property, Resident Services	07.06.19	11.06.19	3.1, 3.2, 3.3
Andrew Ramsden, Assistant Director Finance	Finance and Property, Resident Services	19.06.19	20.06.19	3.3, 3.4, 3.5
Tim Fairhurst, Assistant Director	Lambeth Housing, Resident Services	07.06.19		
Cllr Claire Holland	Cabinet Member: Environment & Clean Air	07.06.19		
Cllr Scott Ainslie	St Leonards Ward	13.06.19		
Cllr Jonathan Bartley	St Leonards Ward	13.06.19		
Cllr Nicole Griffiths	St Leonards Ward	13.06.19		
Cllr Danial Adilypour	Streatham South Ward	13.06.19		
Cllr John Kazantzis	Streatham South Ward	13.06.19		
Cllr Clair Wilcox	Streatham South Ward	13.06.19		
Cllr Malcolm Clark	Streatham Wells Ward	13.06.19		
Cllr Marianna Masters	Streatham Wells Ward	13.06.19		
Cllr Mohammed Seedat	Streatham Wells Ward	13.06.19		

<b>Report history</b>	
<b>Original discussion with Cabinet Member</b>	Ongoing since November 2017. Report discussed with Cabinet Member 20.06.19
<b>Report deadline</b>	n/a
<b>Date final report sent</b>	
<b>Report no.</b>	
<b>Part II Exempt from Disclosure/ confidential accompanying report?</b>	No
<b>Key decision report</b>	No
<b>Background information</b>	
<b>Appendices</b>	Appendix A - Streatham Area Attitudinal Survey Results Appendix B - Streatham Phased CPZ Programme Map Appendix C - St Leonard's Survey Results Analysis Appendix D - Streatham South Survey Results Analysis Appendix E - Streatham Wells Survey Results Analysis Appendix F - Streatham Hill Survey Results Analysis Appendix G - Streatham Area Survey Material


**APPROVAL BY OFFICER IN ACCORDANCE WITH SCHEME OF DELEGATION**

**I confirm I have consulted Finance, Legal and Democratic Services and taken account of their advice and comments in completing the report for approval:**

**Signature:**  **Date:** 9-07-19

**Post: Leonardo Morris, Senior Parking Engineer**

**I approve the above recommendations:**

**Signature**  **Date** 9/7/19

**Post: Bayo Dosunmu, Strategic Director of Resident Services**

**Any declarations of interest (or exemptions granted): none**

**Any conflicts of interest: none**

**Any dispensations: none**